

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MICHELLE MORTON, et al.,

Defendants.

16-cr-00371 (RA)

NOTICE OF MICHELLE MORTON'S PRETRIAL MOTIONS

PLEASE TAKE NOTICE that, pursuant to Rule 12 of the Federal Rules of Criminal Procedure, and upon the accompanying Memorandum of Law and Affidavit of Michelle Morton dated January 16, 2018, defendant MICHELLE MORTON respectfully moves this Court, before the Honorable Ronnie Abrams, at the United State District Court for the Southern District of New York located at 40 Foley Square, New York, New York 10007, for an order providing the following relief:

- 1) Granting Ms. Morton's motion to dismiss the indictment in the interests of justice;
- 2) In the alternative, suppressing evidence the government obtained as a result of Ms. Morton's cooperation pursuant to Rule 12(C);
- 3) Granting Ms. Morton's motion for the government to provide a bill of particulars pursuant to Federal Rule of Criminal Procedure 7(f);
- 4) Granting Ms. Morton's motion to sever her trial from that of her codefendants pursuant to Federal Rules of Criminal Procedure 8(b) and 14(a);
- 5) Preserving Ms. Morton's right to file additional pretrial motions should the need arise.

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Dated: New York, New York
January 16, 2018

Respectfully submitted,

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